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Clark County School District*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

JOHN and JANE DOE I, Guardians Ad Litem
for JOANN DOE I, a minor, individually and on
behalf of all those similarly situated, and JOHN
and JANE DOE II, Guardians Ad Litem for
JOANN DOE II, a minor, individually and on
behalf of all those similarly situated;

Plaintiffs,

vs.

JEREMIAH MAZO; CLARK COUNTY
SCHOOL DISTRICT; DOES 1 through 20;
DOE 1 through 20; ROE CORPORATIONS 1
through 20;

Defendants.

Case No. 2:16-cv-00239-APG-PAL

**[PROPOSED] AMENDED STIPULATION
AND ORDER TO CONTINUE EXPERT
WITNESS DEPOSITIONS AND
DISPOSITIVE MOTION DEADLINES**

(First Request)

Plaintiffs, JOHN and JANE DOE I, GUARDIANS AD LITEM FOR JOANN DOE I, A
MINOR AND JOHN AND JANE DOE II, GUARDIANS AD LITEM FOR JOANN DOE II, A
MINOR (collectively, "Plaintiffs"), Defendant CLARK COUNTY SCHOOL DISTRICT ("CCSD")
and Defendant JEREMIAH MAZO, by and through their respective counsel of record, hereby
stipulate to an extension of expert witness depositions by thirty-two (32) days. The dispositive motion
deadline will need to be extended accordingly. The parties therefore propose the following revised
discovery plan for this Court's consideration.

STIPULATION

I. Background

This case was filed on February 5, 2016, alleging abuse of students by a former CCSD teacher, Jeremiah Mazo, and bringing claims under Title IX against CCSD and state tort claims against all defendants. (Doc. 1). Plaintiffs filed a First Amended Class Action Complaint on March 1, 2017. (Doc. 39). CCSD filed its Answer to the First Amended Class Action Complaint on March 16, 2017, and asserted cross-claims against Defendant Mr. Mazo. (Doc. 43). Mr. Mazo filed an Answer to the Plaintiffs' First Amended Class Action Complaint on June 2, 2017 and his answer to CCSD's Cross-Claims on July 6, 2017 (Doc. Nos. 61, 67).

II. Discovery Completed

Plaintiffs have served Defendant Clark County School District with the following discovery to date:

1. Plaintiffs' Early Case Conference List of Documents and Witnesses Pursuant to FRCP 26(F) served 10/10/2016;
2. Plaintiffs John and Jane Doe I, Guardians ad Litem for Joann Doe I, and John and Jane Doe II, Guardians ad Litem for Joann Doe II's First set of Request of Production of Documents served 10/27/16;
3. Plaintiffs' First Supplement to Early Case Conference List of Documents and Witnesses Pursuant to FRCP 26(F) served 12/14/2016;
4. Plaintiff Jane Doe I as Guardian ad Litem for Joann Doe I's Responses to Clark County School District's First set of Interrogatories served 12/14/2016;
5. Plaintiff Joann Doe I's Responses to Clark County School District's First set of Interrogatories served 12/14/2016;
6. Plaintiff John Doe I as Guardian ad Litem for Joann Doe I's Responses to Clark County School District's First set of Interrogatories served 12/14/2016;
7. Plaintiffs John and Jane Doe I as Guardians ad Litem for Joann Doe I's Responses to

Clark County School District's First set of Request for Production of Documents served 12/14/2016;

8. Plaintiff Jane Doe II as Guardian ad Litem for Joann Doe II's Responses to Clark County School District's First set of Interrogatories served 12/14/2016;

9. Plaintiff Joann Doe II's Responses to Clark County School District's First set of Interrogatories served 12/14/2016;

10. Plaintiff John Doe II as Guardian ad Litem for Joann Doe II's Responses to Clark County School District's First set of Interrogatories served 12/14/2016;

11. Plaintiffs John and Jane Doe II as Guardians ad Litem for Joann Doe II's Responses to Clark County School District's First set of Request for Production of Documents served 12/14/2016;

12. Plaintiffs John and Jane Doe I, Guardians ad Litem for Joann Doe I, and John and Jane Doe II, Guardians ad Litem for Joann Doe II's Second set of Requests for Production of Documents served 01/18/2017;

13. Plaintiff Jane Doe I, as Guardian ad Litem for Joann Doe I, a minor's First set of Requests for Admission served 01/18/2017;

14. Plaintiff Jane Doe I, as Guardian ad Litem for Joann Doe I, a minor's First set of Interrogatories served 01/18/2017;

15. Plaintiff John Doe I, as Guardian ad Litem for Joann Doe I, a minor's First set of Interrogatories served 01/18/2017;

16. Plaintiff John Doe I, as Guardian ad Litem for Joann Doe I, a minor's First set of Requests for Admission served 01/18/2017;

17. Plaintiffs John and Jane Doe I, Guardians ad Litem for Joann Doe I, and John and Jane Doe II, Guardians ad Litem for Joann Doe II's Third set of Requests for Production of Documents served 01/20/2017;

18. Plaintiff John Doe I, as Guardian ad Litem for Joann Doe I, a minor's Second set of Interrogatories served 01/23/2017;

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- 1 19. Plaintiffs' Second Supplement to Early Case Conference List of Documents and
- 2 Witnesses Pursuant to FRCP 26(F) served 02/10/17;
- 3 20. Plaintiff Joann Doe II's Supplemental Responses to CCSD's First set of
- 4 Interrogatories served on 03/01/17;
- 5 21. Plaintiff Joann Doe I's Supplemental Responses to CCSD's First set of Interrogatories
- 6 served on 03/01/17;
- 7 22. Plaintiffs' Third Supplement to Early Case Conference List of Documents and
- 8 Witnesses Pursuant to FRCP 26(F) served 05/31/17;
- 9 23. Plaintiffs' Fourth Supplement to Early Case Conference List of Documents and
- 10 Witnesses Pursuant to FRCP 26(F) served 07/07/17;
- 11 24. Plaintiff John Doe I, as Guardian ad Litem for Joann Doe I, a Minor's Third Set of
- 12 Interrogatories to CCSD served 07/11/17;
- 13 25. Plaintiff John Doe I, as Guardian ad Litem for Joann Doe I, a Minor's Fourth Set of
- 14 Interrogatories to CCSD served 08/22/17;
- 15 26. Plaintiffs' Fifth Supplement to Early Case Conference List of Documents and
- 16 Witnesses Pursuant to FRCP 26(F) served 10/11/17;
- 17 27. Plaintiffs' Expert Designation Pursuant to FRCP 26(A)(2) served 10/13/17.

18 **Defendant Clark County School District has served Plaintiffs with the following**
19 **discovery to date:**

- 20 1. CCSD's Initial Disclosures served 10/05/2016;
- 21 2. CCSD's First set of Interrogatories to Plaintiff Jane Doe I, as Guardian ad Litem for
- 22 Joann Doe I served 11/14/2016;
- 23 3. CCSD's First set of Interrogatories to Plaintiff Joann Doe I served 11/14/2016;
- 24 4. CCSD's First set of Interrogatories to Plaintiff John Doe I, as Guardian ad Litem for
- 25 Joann Doe I served 11/14/2016;
- 26 5. CCSD's First set of Requests for Production of Documents to Plaintiffs John and Jane
- 27 Doe I, as Guardians ad Litem for Joann Doe I served 11/14/2016;

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6. CCSD's First set of Interrogatories to Plaintiff Jane Doe II, as Guardian ad Litem for Joann Doe II served 11/14/2016;
7. CCSD's First set of Interrogatories to Plaintiff Joann Doe II served 11/14/2016;
8. CCSD's First set of Interrogatories to Plaintiff John Doe II, as Guardian ad Litem for Joann Doe II served 11/14/2016;
9. CCSD's First set of Requests for Production of Documents to Plaintiffs John and Jane Doe II, as Guardians ad Litem for Joann Doe II served 11/14/2016;
10. CCSD's Responses to Plaintiffs' First set of Requests for Production of Documents to the Clark County School District served 12/01/2016;
11. CCSD's First Supplemental Disclosures served 12/01/2016;
12. CCSD's Second Supplemental Disclosures served 02/17/17;
13. CCSD's Third Supplemental Disclosures served 02/24/17;
14. CCSD's Responses to Plaintiff John Doe I, as Guardian ad Litem for Joann Doe I, a Minor's First Set of Requests for Admission to CCSD served 02/24/17;
15. CCSD's Responses to Plaintiff Jane Doe I, as Guardian ad Litem for Joann Doe I, a Minor's First Set of Requests for Admission to CCSD served 02/24/17;
16. CCSD's Responses to Plaintiff John Doe I, as Guardian ad Litem for Joann Doe I, a Minor's First set of Interrogatories to CCSD served 02/27/17;
17. CCSD's Responses to Plaintiff Jane Doe I, as Guardian ad Litem for Joann Doe I, a Minor's First set of Interrogatories to CCSD served 02/27/17;
18. CCSD's Responses to Plaintiff John Doe I, as Guardian ad Litem for Joann Doe I, a Minor's Second set of Interrogatories to CCSD served 03/10/17;
19. CCSD's Fourth Supplemental Disclosures Pursuant to FRCP 26(a)(1) and Pursuant to March 6, 2017 Order served 04/05/17;
20. CCSD's Responses to Plaintiff John Doe I, as Guardian ad Litem for Joann Doe I, a Minor's Third set of Interrogatories to CCSD served 07/24/17;
21. CCSD's Fourth Supplemental Disclosures served 08/21/17;

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- 1 22. CCSD's Responses to Plaintiff Jon Doe I, as Guardian ad Litem for Joann Doe I, a
- 2 Minor's Fourth set of Interrogatories to CCSD served 09/21/17;
- 3 23. CCSD's Sixth Supplemental Disclosures served 09/01/2017;
- 4 24. CCSD's Seventh Supplemental Disclosures served 10/13/17;
- 5 25. CCSD's Expert Witness Disclosures served 10/13/17.

6 **The following depositions have been completed to date:**

- 7 1. Ulandra Barnett
- 8 2. Ivy Burns
- 9 3. Sylvia Glass
- 10 4. Jennifer Mattiello
- 11 5. Nestor Mattiello
- 12 6. Jon Okazaki
- 13 7. Julia Pettit
- 14 8. Kristopher Pettit
- 15 9. Christine Prosen
- 16 10. Darrin Puana
- 17 11. Billie Rayford

18 **III. Discovery That Remains to be Completed**

- 19 1. Expert Witness Depositions.

20 **IV. Basis for Extension**

21 The parties request this extension to allow the depositions of the parties' expert and rebuttal
22 expert witness depositions. The parties have diligently engaged in discovery and request an extension
23 to allow for the foregoing outstanding depositions to take place as detailed below. Namely, the parties
24 have been working together to schedule expert depositions, and are exploring the possibility of
25 bringing many, if not all of them, to Las Vegas, Nevada for their depositions.

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V. Proposed Modification

Based on the foregoing, the parties jointly seek a modification of the current deadlines as follows:

1. Current Deadlines:

Discovery Cut-Off Date:	May 29, 2018, 2018
Dispositive Motions:	June 28, 2018
Proposed Joint Pretrial Order:	July 31, 2018 or 30 days after the Court rules on any dispositive motions.

2. Proposed Deadlines:

Discovery Cut-Off Date:	June 30, 2018
Dispositive Motions:	July 30, 2018
Proposed Joint Pretrial Order:	August 29, 2018 or 30 days after the Court rules on any dispositive motions.

3. This request is made in good faith and not for the purposes of delay.

IT IS SO STIPULATED.

Dated this 27th day of April, 2018.

Dated this 27th day of April, 2018.

GREENBERG TRAURIG, LLP

EGLT PRINCE

/s/ Mark E. Ferrario

/s/ Robert T. Eglet

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1 Dated this 27th day of April, 2018.

2 **HALL JAFFE & CLAYTON, LLP**

3 /s/ Steven T. Jaffe

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9 *Attorneys for Defendant Clark County*

10 *School District*

Dated this 27th day of April, 2018.

JOHN G. GEORGE, ESQ.

/s/ John G. George

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Counsel for Defendant Jeremiah Mazo

ORDER

IT IS HEREBY ORDERED.

DATED this 3rd day of May, 2018.

11 
12 **UNITED STATES MAGISTRATE JUDGE**

CERTIFICATE OF SERVICE

Pursuant to FRCP 5(b), I hereby certify that on the 1st day of May, 2018, a true and correct copy of the foregoing **[PROPOSED] AMENDED STIPULATION AND ORDER TO CONTINUE EXPERT WITNESS DEPOSITIONS AND DISPOSITIVE MOTION DEADLINES** was filed electronically via the Court's CM/ECF system. Notice of filing will be served on all parties by operation of the Court's EM/ECF system, and parties may access this filing through the Court's CM/ECF system.

/s/ Kareen Romano
an employee of Greenberg Traurig, LLP